

ESTTA Tracking number: **ESTTA687546**

Filing date: **08/04/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210265
Party	Plaintiff Allstate Insurance Company
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Richard M. LaBarge
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Signature	/rmlabarge/
Date	08/04/2015
Attachments	DOCS-#3328168-v1-motion_to_enlarge_dates.pdf(17928 bytes)

**USE THE ELECTRONIC FORM ANYIN THE UNITED STATES PATENT AND
TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Allstate Insurance Company,)	
)	
Opposer,)	Opposition no. 91210265
)	
v.)	Serial no. 79/118,763
)	
Takushi Yonetani,)	Mark: ALLSTATE
)	
Applicant.)	
_____)	

STIPULATED MOTION TO EXTEND DISCLOSURE DATES

Allstate Insurance Company (“Allstate”) requests that the remaining deadlines in this case be extended by sixty days, so the remaining schedule is:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	10/14/2015
Discovery Closes :	11/13/2015
Plaintiff's Pretrial Disclosures :	12/28/2015
Plaintiff's 30-day Trial Period Ends :	02/11/2016
Defendant's Pretrial Disclosures :	02/26/2016
Defendant's 30-day Trial Period Ends :	04/11/2016
Plaintiff's Rebuttal Disclosures :	04/26/2016
Plaintiff's 15-day Rebuttal Period Ends :	05/26/2016

The grounds for this request are that the parties are engaged in settlement negotiations. The progress of discovery and settlement negotiations is:

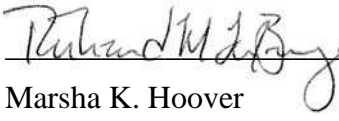
- 1) each side has exchanged its initial disclosures, and Allstate has prepared but not yet served a battery of additional discovery requests.
- 2) a general approach for settlement has been found to be of mutual interest, and some of the major terms concerning use appear to resolvable,
- 3) the details of the suggested settlement terms are still being considered by the parties, and

4) the parties believe that settlement negotiations can be completed within the duration of the requested extension.

Allstate Insurance Company has secured the express consent of all other parties to this proceeding for the requested extension and resetting of dates.

Allstate Insurance Company has provided an e-mail address herewith for itself and for the opposing party so that the Board may issue any order on this motion electronically.

Allstate Insurance Company

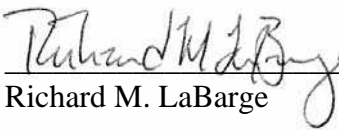
By: 
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Richard M. LaBarge
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August 4, 2015

CERTIFICATE OF SERVICE

I certify that this document is being served on the applicant on August 4, 2015, by delivering a copy by email to the attorney of record for the applicant at:

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Richard M. LaBarge